

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JOSEPH FRAPANPINA III on behalf of)	
Himself and all other similarly situated,)	
)	Case No. 19-cv-00493
Plaintiff,)	
)	
v.)	Judge John Robert Blakey
)	
GARDA CL GREAT LAKES, INC.,)	Magistrate Judge Michael T. Mason
)	
Defendant.)	

**JOINT MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT AND
CERTIFICATION OF A SETTLEMENT CLASS**

The parties, by their respective counsel, move this Court to preliminarily approve the negotiated settlement and certify a settlement class. In support of this Motion, the parties incorporate herein by reference the Memorandum in Support filed contemporaneously with this motion.

Dated: October 22, 2021

Respectfully submitted,

GARDA CL GREAT LAKES, INC.

JOSEPH FRAPANPINA

By: /s/ Mark L. Shapiro

By: /s/ Terrence Buehler

Mark L. Shapiro
Phillip M. Schreiber
Holland & Knight LLP
150 N. Riverside Plaza, Suite 2700
Chicago, IL 60606
312-263-3600
312-578-6666 (Fax)
mark.shapiro@hklaw.com
phillip.schreiber@hklaw.com

Terrence Buehler
The Law Office of Terrence Buehler
19 S. LaSalle St., Ste. 702
Chicago, IL 60603
312-371-4385
tbuehler@tbuehlerlaw.com

Peter Lubin
Patrick Austermuehle
Lubin-Austermuehle
360 West Butterfield Road, Ste. 325
Elmhurst, IL 60126
(630) 333-0333
peter@l-a.law
patrick@l-a.law